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Attorneys for Plaintiffs  
SPORTS SHINKO CO., LTD., and  
SPORTS SHINKO (USA) CO., LTD.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

SPORTS SHINKO CO., LTD.,	)	CIVIL NO. CV 04-00124
	)	ACK/BMK
Plaintiff,	)	<b>PLAINTIFFS' RESPONSE TO</b>
vs.	)	<b>DEFENDANTS OR HOTEL,</b>
QK HOTEL, LLC, a Hawai'i	)	<b>LLC AND MILILANI GOLF</b>
limited liability company,	)	<b>CLUB LLC'S FIRST REQUEST</b>
Defendant.	)	<b>FOR ADMISSIONS; FIRST</b>
	)	<b>REQUEST FOR ANSWERS TO</b>
	)	<b>INTERROGATORIES; AND</b>
	)	<b>FIRST REQUEST FOR</b>
	)	<b>PRODUCTION OF</b>
	)	<b>DOCUMENTS TO PLAINTIFFS</b>
	)	<b>SPORTS SHINKO CO., LTD.</b>
	)	<b>AND SPORTS SHINKO (USA)</b>

) **CO., LTD., DATED JANUARY**  
\_\_\_\_\_  
) **3, 2005**  
)  
SPORTS SHINKO (USA) CO., ) CIVIL NO. CV 04-00125  
LTD., a Delaware corporation, ) ACK/BMK  
)  
Plaintiff, )  
)  
vs. )  
)  
PUKALANI GOLF CLUB, LLC, a )  
Hawai'i limited liability company; )  
and KG MAUI DEVELOPMENT, )  
LLC, a Hawai'i limited liability )  
company, )  
)  
Defendants. )  
\_\_\_\_\_  
)  
SPORTS SHINKO (USA) CO., ) CIVIL NO. CV 04-00126  
LTD, a Delaware corporation, ) ACK/BMK  
)  
Plaintiff, )  
)  
vs. )  
)  
KIAHUNA GOLF CLUB, LLC, a )  
Hawai'i limited liability company; )  
KG KAUAI DEVELOPMENT, LLC, )  
a Hawai'i limited liability )  
company; PUKALANI GOLF )  
CLUB, LLC, a Hawai'i limited )  
liability company; KG MAUI )  
DEVELOPMENT, LLC, a Hawai'i )  
limited liability company; )  
MILILANI GOLF CLUB, LLC, a )  
Hawai'i limited liability company; )

15. *Identify each and every owner of Stock of SS-USA as of February 20, 2004.*

**Objection:** Irrelevant to any claim or defense in this action and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiffs answer as follows:

**ANSWER:**

Sports Shinko Co., Ltd.  
Takamatsu Sports Shinko Country Co., Ltd.  
Inagawakokusai Co., Ltd.  
Amagase Onsen Country Co., Ltd  
Suifu Kanko Co., Ltd.  
Misaki Country Co., Ltd.  
Suho Country Co., Ltd.  
Tsuyama Sports Shinko Country Co., Ltd.  
Boushuu Kaihatsu Co., Ltd.  
Sanyo Kosan Co., Ltd.  
Kinoshita Kensetsu Co., Ltd.  
Higashinasu Country Club Co., Ltd.  
Uresino Kanko Kaihatsu Co., Ltd.  
Izumisano Country Co., Ltd.

16. *State when SS-Japan learned its creditors would commence Involuntary Insolvency Proceedings.*

**Objection:** Vague and ambiguous. Plaintiffs lack capacity to respond; calls for speculation as to former management's personal knowledge. Unduly burdensome, seeks privileged communications and attorney work product. Subject to ongoing discovery. Without waiving these objections, Plaintiffs respond as follows:

**ANSWER:**

VERIFICATION

JAPAN )  
OSAKA ) SS:  
        )

Yoshifiko Madi'da, being first duly sworn on  
oath, deposes and says:

That he is the President of SPORTS SHINKO  
(USA) CO., LTD. and that he is an agent of SPORTS SHINKO (USA)  
CO., LTD. for the purpose of answering the foregoing *requests for*  
*answers to interrogatories* and for making this verification, and the  
foregoing answers are true according to his knowledge, information,  
and belief.

SPORTS SHINKO (USA) CO., LTD.

By \_\_\_\_\_  
Its President

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2005年5月14日 11時09分 (株) 豊富人力サービス